

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 4:19-cv-10520-DHH

CHARU DESAI,
Plaintiff,

v.

UMASS MEMORIAL MEDICAL CENTER,
INC., et al.,
Defendants.

**ASSENTED-TO MOTION FOR
LEAVE TO EXCEED PAGE LIMIT
FOR MEMORANDUM OF LAW BY
DEFENDANTS**

Defendants, UMass Memorial Medical Center, Inc., UMass Memorial Medical Group, Inc., Max Rosen, M.D., and Stephen Tosi, M.D.,¹ with the assent of all parties, move for leave to exceed the page limit set forth in Local Rule 7.1 for their forthcoming memorandum of law in support of their motion for summary judgment, and in support thereof, state as follows:

1. Defendants intend to move for summary judgment on all counts of Plaintiff's Amended Complaint. Plaintiff's claims in this action include eight counts brought against several Defendants, which are diverse in subject matter and scope. Many of Plaintiff's claims are complex and include multiple theories of recovery. The factual record in this action is extensive.

2. Pursuant to Local Rule 7.1(b)(4) of the Local Rules for the District Court for the District of Massachusetts, a memorandum supporting a motion "shall not, without leave of court, exceed 20 pages, double-spaced."

3. In the process of preparing their motion for summary judgment and supporting memorandum of law, Defendants have determined that additional pages are necessary to fully brief the Court on the several claims and diverse legal issues in this matter.

¹ Defendants, Marlborough Hospital and Karin Dill, M.D., intend to file separate dispositive motions, within the page limit set forth by rule.

4. Defendants have conducted a good faith evaluation and have determined that thirty pages would be reasonable and sufficient for their memorandum of law in support of their motion.

5. Counsel for Defendants has conferred with counsel for Plaintiff and Defendant, University of Massachusetts Medical School, and they have assented to the relief requested in this Motion.

WHEREFORE, Defendants, UMass Memorial Medical Center, Inc., UMass Memorial Medical Group, Inc., Max Rosen, M.D., and Stephen Tosi, M.D., respectfully request leave of court to exceed the page limit and to file a memorandum of law in support of their motion for summary judgment of up to thirty (30) pages.

Respectfully submitted,

**UMASS MEMORIAL MEDICAL
CENTER, INC.; UMASS MEMORIAL
MEDICAL GROUP; MAX ROSEN, MD;
and STEPHEN TOSI, MD;**

By their attorneys,

/s/ Reid M. Wakefield

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Dated: December 1, 2021

CERTIFICATE OF SERVICE

I, Reid M. Wakefield, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/Reid M. Wakefield
Reid M. Wakefield, Esq.

Dated: December 1, 2021